

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROBERT O'BRIEN and NICHOLAS MARTIN, )  
Individually, and on behalf of all others similarly )  
situated, )

Plaintiffs, )

v. )

No: 10 CV 2991

PIZZA PANINOS, INC. d/b/a PANINO'S )  
PIZZERIA, an Illinois Corporation, and )  
DOES 1-10, )

Defendants. )

**AFFIDAVIT OF THOMAS A. ZIMMERMAN, JR. IN SUPPORT OF  
CLASS COUNSEL'S PETITION FOR AN  
AWARD OF ATTORNEY'S FEES AND EXPENSES**

I, THOMAS A. ZIMMERMAN, JR., hereby certify and state as follows:

1. I am currently a member of the Zimmerman Law Offices, P.C., counsel for the plaintiffs' class in this action. I submit this affidavit in support of the plaintiffs' petition for an award of attorney's fees and expenses in connection with the services rendered to the plaintiffs and the Class in this action.

2. My firm's compensation for the services it has rendered in this action is wholly contingent. Any fees and reimbursement of expenses will be limited to such amounts as may be awarded by the Court.

3. In connection with the prosecution of this action my law firm served as counsel for the plaintiffs' Class. In that capacity, my firm (a) drafted a Complaint and an Amended Complaint; (b) drafted and filed a Motion for Class Certification and Memorandum of Law in Support of its Motion for Class Certification, (c) reviewed and analyzed Defendant's response to the Motion for

Class Certification; (d) obtained the entry of a protective order, (e) engaged in discovery with the Defendant, (f) issued subpoenas to Defendant's credit card processors for third-party discovery, (g) conducted an investigation relating to the claims and the underlying events and transactions alleged in the Complaint (h) analyzed the evidence and researched the applicable law with respect to the claims of Plaintiffs and the Class against Defendant and the potential defenses thereto, (i) conducted several months of discussions and arms-length negotiations with Defendant's Counsel with respect to a compromise and settlement of the Lawsuit, (j) participated in a settlement conference with the Court where the final settlement terms were reached, (k) jointly drafted the motion for preliminary approval, supporting memorandum of law, class notice, and preliminary approval order, and (l) jointly drafted the joint motion for final approval, and final judgment.

4. My qualifications are set forth in the resume attached hereto.

5. My firm spent a total of 148.25 hours on this litigation, from March 19, 2010 through August 8, 2011. The total lodestar amount for that time at current rates is \$69,848.75. This information was prepared under my direction from contemporaneous time records maintained by my firm, and does not include any time for preparation of this fee petition.

6. My firm also expended a total of \$1,066.65 in unreimbursed expenses in connection with the prosecution of this litigation. These expenses are broken down as follows:

<b>EXPENSES</b>	
Court Fees	\$441.40
Subpoena Fees	\$80.00
Photocopies	\$545.25
<b>TOTAL</b>	<b>\$1,066.65</b>

7. The detailed time and expense entries are attached hereto.

8. The time and expenses incurred pertaining to this case are reflected in the books and records of my firm. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred.

s/ Thomas A. Zimmerman, Jr.

Thomas A. Zimmerman, Jr.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct. Executed on August 9, 2011.

**THOMAS A. ZIMMERMAN, JR.**

Mr. Zimmerman practices extensively in class action, corporate, commercial, medical malpractice, consumer fraud, general civil, product liability, toxic tort and other complex litigation where he has obtained multi-million dollar jury verdicts. Mr. Zimmerman represents both plaintiffs and defendants in state and federal trial and appellate courts in various states nationwide. He also represents individuals and corporations in transactional matters, and before state and federal administrative and regulatory agencies.

In 2000, he was voted one of the *Top 40 Illinois Attorneys Under the Age of 40*. This is especially notable, as there are approximately 60,000 attorneys under the age of forty in Illinois.

In 2003, the Illinois Supreme Court appointed Mr. Zimmerman to the Review Board of the Attorney Registration and Disciplinary Commission. In that capacity, he presides over appeals by attorneys who have been found to have committed misconduct, and imposes discipline for their ethical violations.

The Illinois Governor appointed Mr. Zimmerman to the Illinois Courts Commission. A Commission member presides over proceedings wherein judges are charged with committing ethical violations, and imposes discipline on judges who are found to have engaged in misconduct.

Mr. Zimmerman is admitted to practice law in Illinois, and other states on a case-by-case basis, and he is admitted to practice before the U.S. Supreme Court, federal district courts and federal court of appeals. Based on his demonstrated experience and ability, he was appointed to the federal court trial bar.

Prior to becoming an attorney, Mr. Zimmerman worked for AT&T where he negotiated partnerships with companies for domestic and international joint-venture and new product development activities. During this time, he was the featured speaker at 400 conferences, seminars and presentations. Thereafter, he presented oral testimony at various Federal Senate and Congressional hearings.

He earned a B.S. in computer science-mathematics from the University of Illinois, and an M.B.A. in finance from DePaul University in the evenings while working for AT&T.

After leaving AT&T, Mr. Zimmerman earned his law degree from the Chicago-Kent College of Law, where he was a Ramsey-Burke Scholarship recipient. In law school, he earned the Academic Achievement Award based upon his outstanding grades.

Mr. Zimmerman has been lead counsel in national and state-wide class action litigation, and has handled other multi-party litigation involving such companies as MCI/Worldcom, United Airlines, People's Gas, AT&T, Warner-Lambert, Pfizer, DaimlerChrysler, Commonwealth Edison, Ameritech, Bridgestone/Firestone, as well as others. He has earned high regard in his representation of physicians, dentists, nurses, psychologists, veterinarians, and many other licensed professionals before the Illinois Department of Financial and Professional Regulation, the U.S. Department of Health and Human Services, and other state and federal agencies.

Mr. Zimmerman is currently the chair of the Clerk of the Circuit Court of Cook County Attorney Advisory Committee, and he was the co-chair of the Clerk of the Circuit Court Transition and Strategic Planning Public Policy Subcommittee. Mr. Zimmerman is a member of the Illinois State Bar, Chicago Bar, and Illinois Trial Lawyers Associations, where he serves on various committees. He is also a member of the American Association for Justice. In 2000, he was appointed to the Illinois Trial Lawyers Association Board of Advocates.

He is also involved in numerous community service activities. Since 1988, Mr. Zimmerman has been an Illinois State Board of Education surrogate parent of disabled children; he was a speaker on the rights of disabled people for the Illinois Planning Council on Developmental Disabilities; and he was a Family Shelter Service counselor to battered children for many years. He also was recognized by the federal court for his representation of indigent clients free of charge on *pro bono* cases.

# ZIMMERMAN LAW OFFICES, P.C.

77 West Washington Street  
Suite 1220  
Chicago, Illinois 60602  
Telephone (312) 440-0020  
Facsimile (312) 440-4180  
www.attorneyzim.com

August 9, 2011

Panino's FACTA Class Action

In Reference To: Robert O'Brien, et al. v. Panino's, Inc.  
Court No. 10 CV 2991

## Professional Services

	<u>Hours</u>	<u>Amount</u>
3/19/2010 TAZ Review receipt from client.	0.25	125.00
TAZ Conference with client regarding case.	0.50	250.00
3/22/2010 TAZ Research corporate and registered agent information for defendant.	1.25	748.75
3/23/2010 TAZ Review law regarding FACTA and Clarification Act.	1.50	750.00
3/29/2010 TAZ Draft complaint.	1.25	625.00
4/13/2010 TAZ Revise complaint.	0.25	125.00
4/19/2010 TAZ Draft summons for defendant.	0.25	125.00
TAZ Draft Appearance of counsel for T. A. Zimmerman.	0.25	125.00
TAZ Draft Appearance of counsel for A. M. Tamburelli.	0.25	125.00
4/23/2010 TAZ Conference with client regarding complaint.	0.50	250.00
4/28/2010 TAZ Draft Civil Cover Sheet	0.25	125.00
5/13/2010 TAZ Review law regarding FACTA and Clarification Act.	0.75	375.00
5/14/2010 TAZ Electronically file Complaint, Appearances and Civil Cover Sheet.	0.50	250.00
TAZ Draft e-mail to clerk, and send summons to issue.	0.25	125.00

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		<u>Hours</u>	<u>Amount</u>
5/14/2010	TAZ Review summons issued by Clerk of the Court.	0.25	125.00
	TAZ Draft letter to process server, and send Summons and Complaint to her to serve on Defendant.	0.25	125.00
	TAZ Draft letter to client, and send file-stamped copy of Complaint to him.	0.25	125.00
5/24/2010	TAZ Review Court Order.	0.25	125.00
6/17/2010	TAZ Telephone conference with counsel for defendants regarding an extension of time to answer the Complaint.	0.25	125.00
	TAZ Review e-mail from defendant's counsel regarding proper defendants.	0.25	125.00
7/7/2010	TAZ Draft amended complaint.	0.50	250.00
7/8/2010	TAZ Draft waiver of service of summons.	0.50	250.00
	TAZ Draft notice of lawsuit and request for waiver of service of summons.	0.75	375.00
	TAZ Electronically file amended complaint.	0.25	125.00
	TAZ Draft and review e-mails to and from defendant's counsel regarding amended complaint.	0.25	125.00
7/9/2010	TAZ Draft letter to defendant's counsel, and send amended complaint and waiver of service of summons to him.	0.25	125.00
8/16/2010	TAZ Review waiver of service of summons signed by defendant.	0.25	125.00
	TAZ Telephone conference with defendant's counsel regarding case.	0.25	125.00
	TAZ Electronically file waiver of service of summons signed by defendant.	0.25	125.00
	TAZ Revise motion for class certification.	0.50	250.00
	TAZ Review law relating to class certification in FACTA cases.	2.25	1,125.00
8/18/2010	TAZ Review court order.	0.25	125.00
	TAZ Review judge's standing order regarding initial status report.	0.25	125.00
8/19/2010	TAZ Revise joint initial status report.	0.50	250.00
	TAZ Send draft initial status report to opposing counsel.	0.25	125.00
	TAZ Telephone conference with defendant's counsel regarding initial status report.	0.25	125.00
	TAZ Review law relating to class certification in FACTA cases.	0.75	375.00

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		<u>Hours</u>	<u>Amount</u>
8/19/2010	AMT Draft initial status report.	0.75	300.00
8/20/2010	TAZ Review appearances of counsel for defendant.	0.25	125.00
	TAZ Revise memorandum of law in support of motion for class certification.	2.50	1,250.00
	TAZ Review and analyze defendant's answer to the complaint.	0.50	250.00
8/23/2010	TAZ Revise memorandum of law in support of motion for class certification.	0.75	375.00
8/24/2010	TAZ Revise motion for class certification.	0.75	375.00
8/25/2010	TAZ Court appearance for initial status hearing.	1.00	500.00
	TAZ Review Court Order.	0.25	125.00
8/26/2010	TAZ Revise memorandum of law in support of motion for class certification.	1.25	625.00
8/27/2010	AMT Review and revise motion for class certification.	1.00	400.00
	TAZ Electronically file motion to certify class and supporting memorandum of law.	0.25	125.00
8/30/2010	TAZ Review court order.	0.25	125.00
	TAZ Revise emergency motion to seal documents.	0.25	125.00
	TAZ Draft letter to judge, and deliver courtesy copy of motion for class certification and e-motion to seal documents to her.	0.50	250.00
	AMT Draft motion to seal documents.	0.75	300.00
	TAZ Draft letter to judge, and delivery courtesy copy of motion to seal documents to her.	0.50	250.00
9/1/2010	TAZ Revise motion to seal document.	0.25	125.00
	TAZ Electronically file motion to seal document.	0.25	125.00
9/2/2010	TAZ Telephone conference with judge's clerk regarding motion to seal documents.	0.25	125.00
	TAZ Review Court Order.	0.25	125.00
9/3/2010	TAZ Telephone conference with Defendant's counsel regarding number of transactions.	0.25	125.00
	TAZ Draft letter to judge, and deliver courtesy copy of motion to her.	0.50	250.00
	TAZ Draft motion to file documents under seal.	0.50	250.00

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		<u>Hours</u>	<u>Amount</u>
9/3/2010	TAZ Draft notice of motion.	0.25	125.00
	TAZ Electronically file motion to file documents under seal.	0.25	125.00
9/6/2010	TAZ Draft requests to admit, interrogatories, and requests to produce documents to Defendant.	1.25	625.00
9/8/2010	TAZ Revise request to admit, interrogatories, and requests to produce documents to Defendant.	0.50	250.00
9/9/2010	AMT Court appearance regarding motion for leave to file under seal.	1.00	400.00
	TAZ Review Court Order.	0.25	125.00
9/11/2010	TAZ Review and analyze Defendant's response to Plaintiff's motion for class certification.	2.25	1,125.00
9/12/2010	TAZ Review law cited in Defendant's response to Plaintiff's motion for class certification.	1.75	875.00
9/20/2010	AMT Draft motion to suspend briefing.	1.75	700.00
	TAZ Draft notice of filing.	0.25	125.00
	TAZ Electronically file redacted receipts.	0.25	125.00
	TAZ Revise motion to suspend briefing schedule on motion for class certification.	0.50	250.00
	TAZ Draft notice of motion.	0.25	125.00
	TAZ Electronically file motion to suspend briefing schedule on motion for class certification.	0.25	125.00
	TAZ Draft letter to judge, and delivery courtesy copy of redacted receipts and motion to suspend briefing schedule on motion for class certification to her.	0.50	250.00
9/28/2010	TAZ Court appearance for presentation of our motion to defer briefing.	1.00	500.00
	TAZ Review Court Order.	0.25	125.00
10/4/2010	TAZ Telephone conference with counsel for defendants regarding an extension of time for defendants to respond to discovery.	0.25	125.00
	TAZ Review stipulation for enlargement of time for defendant to respond to discovery.	0.25	125.00
	TAZ Draft e-mail to defendant's counsel regarding stipulation for enlargement of time for defendant to respond to discovery.	0.25	125.00



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		<u>Hours</u>	<u>Amount</u>
10/25/2010	TAZ Review and analyze defendant's answers to plaintiff's first discovery requests.	1.75	875.00
10/26/2010	AMT Review and analyze defendant's response to our discovery requests.	1.25	500.00
	AMT Draft Local Rule 37.2 letter to defendant.	0.75	300.00
	AMT Draft subpoena and rider to SpeedLine Solutions.	0.50	200.00
	AMT Draft subpoena and rider to TransOne Merchant Services.	0.50	200.00
10/27/2010	AMT Telephone conference with judge's clerk regarding canceled court date.	0.25	100.00
	TAZ Review court order.	0.25	125.00
10/28/2010	TAZ Revise subpoena to Speedline Solutions, and rider thereto.	0.25	125.00
	TAZ Revise subpoena to TransOne Merchant Services, and rider thereto.	0.25	125.00
	TAZ Revise Rule 37.2 letter.	0.75	375.00
	TAZ Review e-mail from defendant's attorney regarding discovery.	0.25	125.00
	TAZ Revise subpoena to Speedline Solutions, and rider thereto.	0.25	125.00
11/1/2010	AMT Court appearance for status hearing.	1.00	400.00
	TAZ Review Court Order.	0.25	125.00
11/3/2010	TAZ Review court order.	0.25	125.00
11/9/2010	TAZ Review law relating to insurance coverage for defendant's insurance policies.	3.25	1,625.00
	TAZ Review and analyze defendant's insurance policies and contract with Speedline Solutions.	2.75	1,375.00
	AMT Review and revise defendant's discovery responses.	1.75	700.00
	AMT Research insurance coverage cases and analyze insurance policy to nationwide decisions.	4.25	1,700.00
12/1/2010	TAZ Review Court Order.	0.25	125.00
12/6/2010	TAZ Review letter from defendant's counsel regarding number of credit card transactions.	0.25	125.00
	TAZ Draft letter to defendant's counsel regarding documents.	0.25	125.00
12/16/2010	TAZ Court appearance for status.	1.00	500.00

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		<u>Hours</u>	<u>Amount</u>
12/17/2010	AMT Review Court Order.	0.25	100.00
12/21/2010	TAZ Review and analyze draft protective order.	0.50	250.00
	TAZ Review and analyze Illinois Casualty insurance policy.	1.75	875.00
	TAZ Telephone call with defendant's counsel regarding insurance coverage.	0.25	125.00
	TAZ Draft e-mail to defense counsel regarding draft protective order.	0.25	125.00
12/22/2010	AMT Review court order setting matter for status with Magistrate.	0.25	100.00
12/29/2010	TAZ Review protective order entered by the court.	0.25	125.00
1/12/2011	TAZ Review Court Order.	0.25	125.00
	TAZ Review and analyze defendant's monthly credit card statements.	1.75	875.00
	AMT Attend court regarding initial status before Magistrate Judge.	1.00	400.00
1/13/2011	TAZ Create spreadsheet analysis of defendant's credit card transactions.	2.50	1,250.00
	AMT Telephone call with plaintiff regarding settlement conference.	0.25	100.00
1/14/2011	TAZ Review court order.	0.25	125.00
	TAZ Review and analyze insurance coverage issues in FACTA cases nationwide.	6.25	3,125.00
	AMT Draft e-mail to client regarding re-set settlement conference (O'Brien).	0.25	100.00
	AMT Draft e-mail to client regarding re-set settlement conference (Martin).	0.25	100.00
	AMT Telephone call with judge and opposing counsel regarding rescheduling settlement conference.	0.25	100.00
1/20/2011	AMT Draft letter to defendant's counsel regarding settlement conference.	0.25	100.00
	TAZ Draft and review e-mails to and from defendant's counsel regarding needed documents.	0.25	125.00
1/27/2011	AMT Telephone call with defendant's counsel regarding documents needed.	0.25	100.00
2/3/2011	AMT Review e-mail from counsel.	0.25	100.00
	AMT Draft settlement demand.	0.75	300.00
	AMT Telephone conference with defendant's counsel regarding documents needed for settlement demand preparation.	0.25	100.00

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			<u>Hours</u>	<u>Amount</u>
2/4/2011	TAZ	Electronically file motion for extension of time to submit settlement demand.	0.25	125.00
	TAZ	Revise motion for extension of time to tender settlement demand.	0.25	125.00
	AMT	Draft motion for extension of settlement demand date.	0.50	200.00
	AMT	Telephone conference with defendant's counsel regarding documents to be produced.	0.25	100.00
2/9/2011	AMT	Draft and review e-mails to and from defendant's counsel.	0.25	100.00
	AMT	Review defendant's 2008 and 2009 tax returns.	0.50	200.00
2/10/2011	TAZ	Review and analyze defendant's income tax returns.	0.50	250.00
	TAZ	Revise settlement demand letter.	1.25	625.00
	TAZ	Draft e-mail to defendant's counsel regarding income tax returns.	0.25	125.00
	TAZ	Conference with client regarding settlement demand.	0.50	250.00
2/11/2011	TAZ	Create spreadsheet analysis of settlement demand and class relief.	0.75	375.00
	TAZ	Revise settlement demand letter to defendant.	1.25	625.00
	TAZ	Draft e-mail to defendant's counsel, and send settlement demand to him.	0.25	125.00
	TAZ	Draft e-mails to clients, and send settlement demand to them.	0.25	125.00
2/16/2011	AMT	Telephone conference with defendant's counsel regarding settlement demand.	0.25	100.00
	AMT	Review e-mail from defendant's counsel regarding settlement demand.	0.25	100.00
	AMT	Review e-mail from client.	0.25	100.00
2/17/2011	TAZ	Review e-mail from defendant's attorney regarding extension of time.	0.25	125.00
2/25/2011	AMT	Review defendant's settlement demand.	0.50	200.00
	TAZ	Review court orders resetting status dates.	0.25	125.00
2/26/2011	TAZ	Review and analyze defendant's settlement offer.	0.50	250.00
3/4/2011	TAZ	Draft letter to judge, and deliver settlement letters to her.	0.50	250.00
	TAZ	Telephone conference with judge's clerk regarding status date.	0.25	125.00
	TAZ	Draft e-mail to opposing counsel regarding status date.	0.25	125.00

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			<u>Hours</u>	<u>Amount</u>
3/4/2011	AMT	Review Court Order.	0.25	100.00
3/14/2011	TAZ	Telephone conference with plaintiff to prepare for pre-trial conference.	0.50	250.00
	AMT	Telephone conference with clients regarding settlement conference.	0.25	100.00
	AMT	Telephone conference with judge's clerk regarding excused absence of plaintiff.	0.25	100.00
	AMT	Draft and review e-mails to and from defendant's counsel regarding excused absence of plaintiff.	0.25	100.00
3/15/2011	TAZ	Attend pre-trial settlement conference at court.	3.75	1,875.00
	AMT	Prepare for and attend settlement conference.	4.50	1,800.00
3/16/2011	TAZ	Review court order.	0.25	125.00
	AMT	Telephone conference from court deputy regarding consent to jurisdiction.	0.25	100.00
3/17/2011	TAZ	Review filed copy of consent of magistrate judge.	0.25	125.00
	AMT	Review court order regarding Magistrate consent.	0.25	100.00
3/28/2011	AMT	Review e-mail from court regarding consent to magistrate.	0.25	100.00
	AMT	Draft notice of voluntary dismissal for Does 1-10.	0.25	100.00
	TAZ	Review e-mail from judge's clerk regarding Does 1-10.	0.25	100.00
4/1/2011	TAZ	Review Court Order regarding Does 1-10.	0.25	125.00
4/4/2011	AMT	Draft e-mail to Clerk regarding Court Order dismissing Does 1-10.	0.25	100.00
4/6/2011	TAZ	Review Executive Committee Order reassigning the case to a magistrate.	0.25	125.00
4/8/2011	TAZ	Review Court Order assigning the case to the Magistrate for all purposes.	0.25	125.00
4/11/2011	AMT	Review Court Order.	0.25	100.00
4/21/2011	AMT	Draft and review e-mails to and from defendant's counsel regarding motion for preliminary approval.	0.25	100.00
4/22/2011	AMT	Review and respond to e-mail from client.	0.25	100.00
	AMT	Draft and review e-mails to and from defendant's counsel.	0.25	100.00
4/24/2011	TAZ	Review law regarding preliminary approval of class settlement.	1.25	625.00

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		<u>Hours</u>	<u>Amount</u>
4/25/2011	TAZ Review and revise settlement agreement.	2.50	1,000.00
	TAZ Review and revise motion for preliminary approval.	1.75	700.00
	TAZ Review and revise notice for Chicago Tribune.	0.50	200.00
	TAZ Telephone conferences with clients regarding settlement.	0.50	250.00
	AMT Review e-mail from defendant's counsel.	0.25	100.00
	AMT Review settlement documents.	1.00	400.00
4/26/2011	TAZ Review FACTA class settlements nationwide.	2.50	1,250.00
	TAZ Revise declaration of Thomas A. Zimmerman, Jr. in support of motion for preliminary approval.	1.25	625.00
	AMT Draft memorandum in support of motion for preliminary approval.	1.00	400.00
	AMT Draft affidavit regarding memorandum in support of motion for preliminary approval.	0.50	200.00
	AMT Draft and review e-mails to and from defendant's counsel regarding settlement documents.	0.25	100.00
	AMT Review e-mail from defendant's counsel.	0.25	100.00
4/27/2011	TAZ Revise memorandum of law in support of motion for preliminary approval of settlement.	3.50	1,750.00
	TAZ Telephone conference with defendant's attorney regarding settlement documents.	0.25	125.00
	TAZ Draft e-mail to defendant's attorney, and send revised settlement documents to him.	0.25	125.00
4/28/2011	TAZ Revise settlement agreement and preliminary approval motion and memorandum of law.	0.75	375.00
	TAZ Draft e-mails to clients, and send settlement papers to them.	0.25	125.00
	TAZ Revise full notice.	0.50	250.00
	TAZ Revise summary notice.	0.25	125.00
	TAZ Revise preliminary approval order.	0.50	250.00
	TAZ Revise final approval order.	0.25	125.00
	TAZ Revise Judgment.	0.50	250.00

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			<u>Hours</u>	<u>Amount</u>
4/28/2011	TAZ	Draft e-mail to defendant's counsel, and send revised settlement documents to him.	0.25	125.00
	AMT	Review defendant's counsel's revisions to settlement documents.	0.50	200.00
4/29/2011	TAZ	Telephone conference with advertising agency regarding publication of summary notice in Chicago Tribune.	0.25	125.00
	TAZ	Telephone conference with defendant's attorney regarding publication of summary notice in Chicago Tribune.	0.25	125.00
	TAZ	Draft e-mail to advertising agency, and send summary notice to them.	0.25	125.00
	TAZ	Revise settlement papers to reflect correct edition of Chicago Tribune.	0.25	125.00
	TAZ	Draft e-mail to defendant's attorney, and send signature pages and revised settlement documents to him.	0.25	125.00
	TAZ	Draft and review e-mails to and from clients regarding settlement papers.	0.25	125.00
	TAZ	Draft and review e-mails to and from defendant's attorney regarding extension of time.	0.25	125.00
	TAZ	Review Court Order.	0.25	125.00
	AMT	Review executed settlement documents.	0.25	100.00
5/2/2011	TAZ	Draft and review e-mails to and from class notice advertiser regarding class notice.	0.25	125.00
	TAZ	Send class notice cost information to defendant's counsel.	0.25	125.00
	TAZ	Revise judgment.	0.25	125.00
	TAZ	Send revised judgment to defendant's attorney.	0.25	125.00
5/3/2011	TAZ	Draft e-mail to advertiser regarding class notice.	0.25	125.00
	TAZ	Research Class Action Fairness Act.	0.75	375.00
	TAZ	Revise settlement agreement regarding CAFA notice.	0.25	125.00
	TAZ	Draft e-mail to defendant's counsel, and send revised settlement agreement to him.	0.25	125.00
5/4/2011	TAZ	Review e-mail from defendant's attorney regarding settlement papers.	0.25	125.00
5/5/2011	AMT	Multiple telephone conferences with defendant's counsel regarding settlement documents.	0.25	100.00

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			<u>Hours</u>	<u>Amount</u>
5/6/2011	TAZ	Draft and review e-mails to and from defendant's attorney regarding settlement documents.	0.25	125.00
	TAZ	Revise settlement documents to incorporate final revisions.	0.25	125.00
	TAZ	Send revised settlement documents to defendant's attorney.	0.25	125.00
	TAZ	Review and analyze motion for preliminary approval of settlement that was filed with the Court along with exhibits.	0.25	125.00
	AMT	Multiple telephone conferences with defendant's counsel regarding settlement documents.	0.25	100.00
	AMT	Draft and review multiple e-mails to and fro defendant's counsel.	0.50	200.00
	AMT	Legal research regarding CAFA requirements.	0.25	100.00
	AMT	Draft settlement agreement.	0.50	200.00
5/9/2011	TAZ	Review notice of motion filed by defendant.	0.25	125.00
	TAZ	Electronically file memorandum in support motion for preliminary approval, and proffered final judgment.	0.25	125.00
	TAZ	Draft letter to judge, and deliver courtesy copy of memorandum of law and final judgment to her.	0.50	250.00
	AMT	Draft e-mail to defendant's counsel regarding motion for preliminary approval.	0.25	100.00
	AMT	Telephone conference with defendant's counsel regarding settlement.	0.25	100.00
5/13/2011	TAZ	Revise settlement timeline.	0.75	375.00
	TAZ	Draft e-mail to defendant's attorney, and send settlement timeline to him.	0.25	125.00
	TAZ	Review court order granting motion for preliminary approval.	0.25	125.00
	TAZ	Draft and review e-mails to and from defendant's attorney regarding class notice.	0.25	125.00
	TAZ	Review and analyze final version of summary notice and order granting preliminary approval.	0.25	125.00
	TAZ	Draft and review e-mails to and from defendant's attorney regarding final version of summary notice and preliminary approval order.	0.25	125.00
	AMT	Prepare for and attend court for preliminary approval.	1.50	600.00
	AMT	Prepare for and appear in court for preliminary approval.	0.25	100.00

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		<u>Hours</u>	<u>Amount</u>
5/13/2011	AMT Review Court Order.	0.25	100.00
5/16/2011	AMT Draft and review e-mails to client regarding settlement status.	0.25	100.00
	TAZ Review Class notice to be published from advertising agency.	0.25	125.00
5/18/2011	TAZ Review preliminary approval order entered by the Court.	0.25	125.00
	AMT Review Court Order.	0.25	100.00
5/19/2011	TAZ Review proposed class notice to be published in the Chicago Tribune. Draft and review e-mails to and from advertiser regarding class notice.	0.25	125.00
	TAZ Review Court Order.	0.25	125.00
5/26/2011	TAZ Review affidavit of publication of Class notice from newspaper.	0.25	125.00
6/13/2011	TAZ Review Court Order regarding class action settlement.	0.25	125.00
8/1/2011	TAZ Draft e-mail to defendant's counsel regarding no-opt outs or objections.	0.25	125.00
8/8/2011	TAZ Review and revise motion for final approval.	0.25	125.00
	TAZ Review and revise memorandum of law in support of motion for final approval.	1.25	625.00
	TAZ Review and revise judgment.	0.25	125.00
	TAZ Review and revise final approval order.	0.25	125.00
	TAZ Send revised final approval documents to defendant's counsel.	0.25	125.00
	For professional services rendered	148.25	\$69,848.75
	Additional Charges :		
5/14/2010	Photocopies (Summons, Complaint, Appearances, Civil Cover Sheet, 311 pages at \$0.25 per page)		77.75
	Clerk of the Circuit Court		350.00
6/9/2010	Audrey Newton (Special process server)		91.40
8/27/2010	Photocopies (motion for class certification and memorandum of law with exhibits, 763 pages at \$0.25 per page)		190.75
	Photocopies (defendant's answer to written discovery and insurance policies, 287 pages at \$0.25 per page)		71.75
10/29/2010	SpeedLine Solutions, Inc.		40.00



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	<u>Amount</u>
10/29/2010 TransOne Merchant Services	40.00
1/12/2011 Photocopies (defendant's monthly credit card statements, 573 pages at \$0.25 per page)	143.25
4/28/2011 Photocopies (settlement papers, 247 pages at \$0.25 per page).	61.75
Total costs	<u>\$1,066.65</u>
Total amount of this bill	<u>\$70,915.40</u>
Balance due	<u><u>\$70,915.40</u></u>